

1 The Honorable John H. Chun
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 STATE OF WASHINGTON, et al.,

14 NO. 2:25-cv-00602-JHC

15 Plaintiffs,

16 DECLARATION OF
17 KELLY PARADIS

v.

18 DONALD J. TRUMP, in his official
19 capacity as President of the United States of
20 America, et al.,

21 Defendants.

22 I, KELLY PARADIS, declare as follows:

23 1. I am over the age of 18, competent to testify as to the matters herein, and make
24 this declaration based on my personal knowledge.

25 2. I am a Deputy Solicitor General in the Solicitor General's Office of the
26 Washington State Attorney General's Office. I am one of the attorneys representing the State of
Washington in this matter.

27 3. Exhibit A is a true and correct excerpt of the transcript from the April 17, 2025
28 preliminary injunction hearing in *League of United Latin American Citizens v. Executive Office*
29 *of the President*, No. 1:25-cv-00946 (D.D.C. 2025).

4. Exhibit B consists of true and correct excerpts of the Conference Report on the National Voter Registration Act of 1993, H.R. Rep. No. 103-66 (1993) (Conf. Rep.), and the Senate's agreement to the Conference Report, 139 Cong. Rec. S5746-03 (Daily Ed. May 11, 1993).

5. Exhibit C is a true and correct excerpt from the Congressional Globe, Cong. Globe, 42d Cong., 2d Sess. 141 (1871) (remarks of Rep. Butler).

6. Exhibit D is a true and correct copy of Memorandum of Decision Concerning State Requests to Include Additional Proof-of-Citizenship Instructions on the National Mail Voter Registration Form dated January 17, 2014.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 28th day of May 2025 at Seattle, Washington.

s/Kelly Paradis
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